

FILED

APR 13 2022

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO.
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JORGE ALBERTO MARTINEZ,

Defendant.

4:22CR208 SEP/PLC

INDICTMENT

COUNT I

The Grand Jury charges that:

On or about February 21, 2022, at approximately 3:06 AM, in Jefferson County, within the Eastern District of Missouri,

JORGE ALBERTO MARTINEZ,

the Defendant herein, through the use of the telephone or other instrument of interstate or foreign commerce, did maliciously convey false information knowing the same to be false, concerning an attempt allegedly being made to damage or destroy by means of fire or an explosive the Walmart located at 2201 Michigan Avenue, Arnold, Missouri.

In violation of Title 18, United States Code, Section 844(e).

COUNT II

The Grand Jury further charges that:

On or about February 22, 2022, at approximately 1:05 AM, in Jefferson County, within the Eastern District of Missouri,

JORGE ALBERTO MARTINEZ,

the Defendant herein, through the use of the telephone or other instrument of interstate or foreign commerce, did maliciously convey false information knowing the same to be false, concerning an attempt allegedly being made to damage or destroy by means of fire or an explosive the Walmart located at 2201 Michigan Avenue, Arnold, Missouri.

In violation of Title 18, United States Code, Section 844(e).

COUNT III

The Grand Jury further charges that:

On or about February 22, 2022, at approximately 6:12 AM, in Jefferson County, within the Eastern District of Missouri,

JORGE ALBERTO MARTINEZ,

the Defendant herein, through the use of the telephone or other instrument of interstate or foreign commerce, did maliciously convey false information knowing the same to be false, concerning an attempt allegedly being made to damage or destroy by means of fire or an explosive the Walmart located at 2201 Michigan Avenue, Arnold, Missouri.

In violation of Title 18, United States Code, Section 844(e).

COUNT IV

The Grand Jury further charges that:

On or about February 22, 2022, at approximately 9:49 PM, in Jefferson County, within the Eastern District of Missouri,

JORGE ALBERTO MARTINEZ,

the Defendant herein, through the use of the telephone or other instrument of interstate or foreign commerce, did maliciously convey false information knowing the same to be false, concerning

an attempt allegedly being made to damage or destroy by means of fire or an explosive the Target located at 3849 Vogel Road, Arnold, Missouri.

In violation of Title 18, United States Code, Section 844(e).

COUNT V

The Grand Jury further charges that:

On or about February 22, 2022, at approximately 10:12 PM, in Jefferson County, within the Eastern District of Missouri,

JORGE ALBERTO MARTINEZ,

the Defendant herein, through the use of the telephone or other instrument of interstate or foreign commerce, did maliciously convey false information knowing the same to be false, concerning an attempt allegedly being made to damage or destroy by means of fire or an explosive the Walmart located at 2201 Michigan Avenue, Arnold, Missouri.

In violation of Title 18, United States Code, Section 844(e).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

ALLISON H. BEHRENS, #38482MO
Assistant United States Attorney